

Nos. 25-1018 (L), 25-1019, 25-1024

**IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

JEFFERSON GRIFFIN,
Plaintiff – Appellee,

v.

NORTH CAROLINA STATE BOARD OF ELECTIONS,
Defendant – Appellant,
and

ALLISON RIGGS; NORTH CAROLINA ALLIANCE FOR RETIRED
AMERICANS; VOTEVETS ACTION FUND; TANYA WEBSTER-DURHAM;
SARAH SMITH; JUANITA ANDERSON,
Intervenor-Defendants – Appellants.

On Appeal from the United States District Court
for the Eastern District of North Carolina

**MOTION FOR JUDICIAL NOTICE
IN SUPPORT OF BRIEF OF *AMICI CURIAE*
NORTH CAROLINA VOTERS AND THE
LEAGUE OF WOMEN VOTERS OF NORTH CAROLINA**

Jessica A. Marsden
Anne Harden Tindall
Protect Democracy Project
510 Meadowmont Village Cir., #328
Chapel Hill, NC 27517
jess.marsden@protectdemocracy.org
anne.tindall@protectdemocracy.org
(202) 579-4582

Hayden Johnson
Protect Democracy Project
2020 Pennsylvania Ave. NW, #163
Washington, DC 20006
hayden.johnson@protectdemocracy.org
(202) 579-4582

Stacey Leyton
Danielle Leonard
Altshuler Berzon LLP
177 Post Street, Suite 300
San Francisco, CA 94108
sleyton@altber.com
dleonard@altber.com
(415) 421-7151

MOTION FOR JUDICIAL NOTICE

Amici North Carolina voters Spring Dawson-McClure, Susan Copland Arnold Rudolph, Jennifer Baddour, Heba Salama, Iryna Merideth, Rani Dasi, and the League of Women Voters of North Carolina respectfully request that the Court take judicial notice, pursuant to Federal Rule of Evidence 201, of the following public records, which are attached as Exhibits 1-6 hereto for consideration with their Amicus Brief filed concurrently (to which the parties consented to filing). These documents are part of the administrative record and proceedings before the Appellant-Respondent North Carolina State Board of Elections (“NCSBE”), are public records, and are relevant to the matters pending before this Court.

Each of the individual *amici* is a voter who is targeted by Appellee-Petitioner Jefferson Griffin for disenfranchisement, and who submitted a letter to NCSBE during the state administrative proceedings in this matter. *Amici* requests that the Court take judicial notice of the attached documents, which include the letters they submitted to the NCSBE—and, where provided, the NCSBE’s response—for its consideration ahead of the December 11, 2024 hearing concerning Appellee-Petitioner Griffin’s protests of their votes. *Amici* provided these documents in their brief before the District Court, which the Court accepted and noted “aided in the court’s decisional process.” JA306. Two *amici*, Dawson-McClure and Rudolph,

have also included copies of their voter registration records because they were able to retrieve those documents from their County Board of Elections in recent days, which are also public records subject to judicial notice.

These documents from affected voters are therefore part of the state administrative record for the decision directly challenged in this litigation, are public records, or both, and the accuracy of these documents is not reasonably subject to dispute. *Amici* move the Court to take judicial notice of these documents in connection with the concurrently filed Amicus Brief to which the parties consented.

DISCUSSION

A. Legal Authority for Judicial Notice

Judicial notice may be taken at “any stage of the proceeding.” Fed. R. Evid. 201(d); *see also Massey v. Ojaniit*, 759 F.3d 343, 353 (4th Cir. 2014) (observing that an appellate court may take judicial notice of the same materials as could a district court). Thus, judicial notice may be taken for the first time on appeal. The court “must take judicial notice if a party requests it and the court is supplied with the necessary information.” Fed. R. Evid. 201(c)(2). Courts also take judicial notice of documents submitted by *amici*. *See, e.g., N. Carolina ex rel. N. Carolina Dep't of Admin. v. Alcoa Power Generating, Inc.*, No. 5:13-CV-633-BO, 2015 WL 224740, at *3 (E.D.N.C. Jan. 15, 2015).

State administrative agencies like the NCSBE are sources “whose accuracy cannot reasonably be questioned.” Fed. R. Evid. 201(b). This Court may therefore take judicial notice of public records including proceedings and documents from state administrative and adjudicative proceedings, such as the proceedings before the Board that are the subject of the claims in this case. *E.g.*, *Goldfarb v. Mayor & City Council of Baltimore*, 791 F.3d 500, 508 (4th Cir. 2015) (“a court may properly take judicial notice of ‘matters of public record’ and other information that, under Federal Rule of Evidence 201, constitute ‘adjudicative facts’”); *Hall v. Virginia*, 385 F.3d 421, 424 (4th Cir. 2004) (proper to consider “publicly available [statistics] on the official redistricting website of the Virginia Division of Legislative Services.”).

The records before the NCSBE referenced in this motion, Exhibits 1-6, are the proper subject of judicial notice because they were part of the record before a reliable state agency and relate to proceedings between the parties before this Court on a relevant issue. Specifically, Exhibits 1-6 contain letters voters sent to the NCSBE upon learning that their vote was being protested and, where the NCSBE responded, includes the NCSBE’s response email. Two voters also provide copies of their voter registration forms that they have retrieved from their county boards of election, which are also public records. These are part of the administrative agency record or other public records, and are not documents “subject to reasonable

dispute.” Fed. R. Evid. 201(b). The inclusion of these public records, including documents in the public record of these state proceedings, is something that “can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned.” Fed. R. Evid. 201(b)(1)-(2)).

B. The Documents to be Noticed Are Directly Relevant to this Appeal

This appeal is from the remand of Appellee-Petitioner’s claims challenging the decision of the NCSBE, which rejected Griffin’s request to invalidate votes that include *amici*’s votes. The District Court improperly remanded Griffin’s challenges, after incorrectly minimizing the federal interests at stake. The appeal from that remand directly raises the questions of whose important federal rights are at stake in these cases, which rights are at stake, and whether the District Court’s removal decision pursuant to 28 U.S.C. §§ 1441 and 1443, and decision to abstain from exercising federal jurisdiction, failed to give proper weight to those rights. As further described in their brief, *amici* provide these materials to illuminate the important federal rights at issue in this appeal. These documents exemplify how the post-election challenge by a losing candidate seeking to disqualify votes already cast threatens to disenfranchise properly registered voters in violation of the Constitution, and help to demonstrate to this Court the importance of the federal courts exercising

jurisdiction to preserve and protect the right to vote from arbitrary and unconstitutional denial.

CONCLUSION

For the reasons set forth above, *amici* voters respectfully request this Court grant this motion to take judicial notice of the Exhibits attached hereto.

This 17th Day of January 2025

Respectfully Submitted,

/s/ Jessica A. Marsden

Jessica A. Marsden

Protect Democracy Project

510 Meadowmont Village Circle, No.
328

Chapel Hill, NC 27517

jess.marsden@protectdemocracy.org

(202) 579-4582

Fax: 202-769-3176

State Bar No. 50855

Attorney for *Amici Curiae*

Anne Harden Tindall

Protect Democracy Project

510 Meadowmont Village Circle, No.
328

Chapel Hill, NC 27517

anne.tindall@protectdemocracy.org

(202) 579-4582

Fax: 202-769-3176

State Bar No. 31569

Hayden Johnson
Protect Democracy Project
2020 Pennsylvania Ave. NW, Suite #
163
Washington, DC 20006
hayden.johnson@protectdemocracy.o
rg
(202) 579-4582
Fax: 202-769-3176

Stacey Leyton
Danielle Leonard
Altshuler Berzon LLP
177 Post Street, Suite 300
San Francisco, CA 94108
(415) 421-7151
sleyton@altber.com
dleonard@altber.com

Counsel for Amici Curiae

CERTIFICATE OF SERVICE

I certify that the foregoing was filed electronically with the Clerk of Court using the CM/ECF system, which will automatically serve electronic copies on all counsel of record.

Dated: January 17, 2025

/s/ Jessica A. Marsden

Jessica A. Marsden

Attorney for Amici Curiae

CERTIFICATE OF COMPLIANCE

This document complies with the type-volume limit of FRAP 27(d)(2), because, excluding the parts of the document exempted by FRAP 32(f), this document contains 926 words.

This document complies with the typeface requirements of FRAP 32(a)(5) and the type-style requirements of FRAP 32(a)(6) because this document has been prepared in a proportionally spaced typeface using Microsoft Word 365 in 14-point Times New Roman.

Dated: January 17, 2025

/s/ Jessica A. Marsden

Jessica A. Marsden

Attorney for Amici Curiae

EXHIBIT 1



Fwd: How to protect my vote

Fri, Dec 6, 2024 at 5:01 PM

----- Forwarded message -----

----- Forwarded message -----

From: **Spring Dawson-McClure** <srdm76@gmail.com>
Date: Fri, Dec 6, 2024 at 4:43 PM
Subject: How to protect my vote
To: <elections.sboe@ncsbe.gov>

Dear Chair and Members of the Board of Elections:

My name is Spring Dawson-McClure, and I am an eligible registered voter in North Carolina and a U.S. citizen. The NC Republican Party sent me a postcard with vague wording about an election protest, but it didn't include any information about how to protect my vote, so I am reaching out to you.

I was born and raised in North Carolina and attended UNC-Chapel Hill, registering to vote here for the first time when I was 18 years old in 1994. While out of the state for graduate school and to begin my career, I returned in 2012 and have lived at the same Orange County address ever since. I believe I've only missed one primary in that time.

Judge Griffin's protest doesn't include any individualized evidence that I failed to provide all the information the NCSBE requested when I registered to vote. If anything is missing from my voter file, I don't know why, but I do know that I showed my NC Driver's license to poll workers when I voted in person in the 2024 primary and general elections. I had also checked online to ensure that my registration was active after hearing reports of attempts to disenfranchise voters; my voter profile was indeed active. I'm a native North Carolinian, long time and regular voter, U.S. citizen, and it would be wrong, undemocratic, and violate my constitutional rights if the NCSBE were to throw out my vote.

I am shocked and distressed that it is even remotely possible that my vote and so many others' would not be counted. In this election cycle and so many others, I volunteered many weekends and evenings to get-out-the-vote efforts. I make this choice and commitment as a full-time working mother because I believe deeply that strong civic engagement is the foundation for the society that all of our children deserve. I've taken my kids to the polls their whole lives. With so much uncertainty in our country, I urge you to show our children that this fundamental aspect of democracy is intact.

Sincerely,
Spring Dawson-McClure, PhD



NORTH CAROLINA VOTER REGISTRATION APPLICATION

Please use black or blue ink and print legibly.

07

FOR OFFICE USE ONLY

Date Received

1 Are you a citizen of the United States of America? ☒ Yes ☐ No

Will you be at least 18 years of age on or before election day? ☒ Yes ☐ No

Are you at least 16 years of age and understand that you must be 18 years of age on or before election day to vote? ☒ Yes ☐ No

2 LAST NAME (Required) DAWSON-MCCLEURE

MIDDLE NAME (Required) ROSE

FIRST NAME (Required) SPRING

If you know your NC Voter Registration Number, please enter it here.

DATE OF BIRTH (Required) [REDACTED] ☐ Jr ☐ Sr ☐ III ☐ IV ☐ V

COUNTY OF BIRTH

STATE OF BIRTH

3 Do you have a NC Driver's License or DMV-issued Identification card? If yes, provide the number. ☐ Yes ☒ No
If you do not have a NC DMV-issued license or ID card, do you have a Social Security Number? If yes, provide the last 4 digits. ☐ Yes ☒ No XXX-XX-XXXX

RESIDENTIAL ADDRESS INFORMATION (STREET ADDRESS WHERE YOU LIVE) - No P.O. Boxes or Rural Routes

4

STREET ADDRESS (Required) [REDACTED]

APARTMENT, LOT, OR UNIT NUMBER

STATE N C ZIP CODE 27278

COUNTY ORANGE

Have you lived here for 30 days or more? ☒ Yes ☐ No

If "No," date moved? MMDDYYYY

PHONE (Optional)

MAILING ADDRESS

5

MAILING ADDRESS (If different from your residential address)

CITY

STATE

ZIP CODE

MAP/DIAGRAM

If you do not have a street address, draw a map of where you reside. Please include roads and landmarks.

6

GENDER

☒ Female ☐ Male

RACE

☐ African American/Black ☐ Asian ☒ White

☐ American Indian/Alaska Native ☐ Multiracial ☐ Other

ETHNICITY

☐ Hispanic/Latino ☒ Not Hispanic/Latino

POLITICAL PARTY AFFILIATION

☒ Democrat ☐ Republican ☐ Libertarian ☐ Unaffiliated ☐ Other

If you indicate a political party that is not currently qualified or you do not indicate a choice, you will be listed as "Unaffiliated."

PREVIOUS REGISTRATION (Name & Address used for your last voter registration - If applicable)

7

LAST NAME USED IN PREVIOUS REGISTRATION

FIRST NAME

PREVIOUS ADDRESS

STATE

ZIP CODE

PREVIOUS CITY

PREVIOUS COUNTY

I, the undersigned, do hereby certify, under penalty of perjury, that in addition to having read and understood the contents of this form, that:

I am a United States citizen, as indicated above;

I am at least 18 years old, or will be at the time of the next general election, or I am at least 16 years old and understand that I must be at least 18 years old on election day of the general election in order to vote;

I have been a resident of North Carolina, this county, precinct, or other election district for 30 days before the election in which I intend to vote;

I will not vote in any other county or state after submission of this form and if I am registered elsewhere, I am cancelling that registration at this time; and

I have not been convicted of a felony, or if I have been convicted of a felony, I have completed my sentence, including any probation or parole.

My citizenship and voting rights are automatically restored upon completion of the sentence. No special document is needed.)

[Signature]

9/15/12

WARNING: If you sign this form and know it to be false, you can be convicted of a

EXHIBIT 2



Fwd: 6th generation North Carolinian - MY VOTE IS VALID

Copland Rudolph <copland.rudolph@acsgmail.net>

Thu, Dec 19, 2024 at 2:07 PM

To: [REDACTED]

Copland Arnold Rudolph

Executive Director | She/Her/Hers



PO Box 3196

Asheville, NC 28802.....

(828) 350-6174

www.acsf.org

[@ACSFound](#)

[@ACSF828](#)



To schedule a meeting with me visit: [Copland's Calendar](#)

NOTE: I live and work on traditional Cherokee lands. DBP ShS& CWY, home to members of the Tsalagiwi Detsadaniłvgi, CWYᏚᏍᏏᏏᏚᏚ, the Eastern Band of the Cherokee Indians. (Guide to [indigenous land and territorial acknowledgements](#))

----- Forwarded message -----

From: **SVC_SBOE.Elections** <Elections.SBOE@ncsbe.gov>

Date: Fri, Dec 6, 2024 at 8:14AM

Subject: RE: [External] 6th generation North Carolinian - MY VOTE IS VALID

To: Copland Rudolph <copland.rudolph@acsgmail.net>

Good morning,

Thank you for contacting the NC State Board of Elections.

A candidate for N.C. Supreme Court, Jefferson Griffin, has challenged the election results and has alleged that some voters were not eligible to vote in the election.

If you received a notice from the North Carolina Republican Party stating, "your vote may be affected by one or more protests filed in relation to the 2024 general election," it means that Mr. Griffin has alleged that your ballot is ineligible.

The State Board and county boards of elections are considering these challenges in the coming weeks. If you would like to get in touch with the parties to this proceeding, the email address for the candidate bringing the challenges is info@jeffersongriffin.com. The email address for the candidate opposing the challenges is team@riggsforourcourts.com.

Thank you for contacting us.

Regards,

Jessica Buie

Learning and Operations Manager

www.ncsbe.gov



From: Copland Rudolph <copland.rudolph@acsgmail.net>
Sent: Thursday, December 5, 2024 9:35 PM
To: SVC_SBOE.Elections <Elections.SBOE@ncsbe.gov>
Subject: [External] 6th generation North Carolinian - MY VOTE IS VALID

You don't often get email from copland.rudolph@acsgmail.net. [Learn why this is important](#)

CAUTION: External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

Dear Chair and Members of the Board of Elections:

My name is Susan Copland Arnold Rudolph, and I am an eligible, registered North Carolina voter and a U.S. citizen. I learned from a voting rights advocate that my name is on a list of voters in Buncombe County subject to an election protest from Judge Jefferson Griffin based on allegedly "incomplete" voter files. I've seen no correspondence from Judge Griffin or anyone else alerting me to this challenge to my vote.

I am 57 and was born and raised in Asheville, North Carolina. My family has been in Western North Carolina since the early 1800's and my great grandmother worked the polls every election and she often took me with her. While out of the state for college, I voted for the first time in 1988. I have returned and voted in North Carolina several times in my adult life and have been back here for twelve years at the same address. I am a regular voter in NC elections. This year, I voted in-person in the primary and general elections, both times using my NC Drivers' License as my required Photo ID.

I'm not aware of Judge Griffin or anyone else producing to the NCSBE any individualized evidence that I am not properly registered to vote in Buncombe County or that I've ever failed to provide information requested of me by elections officials. If my voter file is "incomplete," I don't know why. If my file includes any errors or is missing information, that is not my fault and certainly shouldn't invalidate my vote. **I followed all of the rules in registering and voting; to throw out my ballot after the election would be undemocratic, would cast doubt on the validity of the Supreme Court election, and would violate my constitutional rights.**

I work in public education and have spent my entire career in service to my community. Hurricane Helene has been devastating to our region and yet we voted in record numbers despite not having potable water or wifi or electricity when voting started. To have a sore loser challenge my vote is worse than insulting- it is tone deaf to the reality on the ground. To my knowledge, the last person found committing voter fraud in our region was Mark Meadows.

There is work to be done in our city and the fact that I have to worry about my vote being overturned leaves me gravely concerned for the state of our state. At a time when politicians should be rolling up their sleeves and supporting WNC, Judge Griffin is demonstrating why the majority of voters in NC made a different choice.

In community,
Copland Rudolph

Copland Arnold Rudolph
Executive Director |She/Her/Hers

PO Box 3196
Asheville, NC 28802.....
(828) 350-6174

www.acsf.org
[@ACSFound](#)
[@ACSF828](#)

To schedule a meeting with me visit: [Copland's Calendar](#)

NOTE: I live and work on traditional Cherokee lands. ᎠᎩᎠ ᎠᎩᎠ ᎠᎩᎠ ᎠᎩᎠ, home to members of the Tsalagiya Detsadanilvgi, ᎠᎩᎠ ᎠᎩᎠ ᎠᎩᎠ, the Eastern Band of the Cherokee Indians. (Guide to [indigenous land and territorial acknowledgements](#))



NORTH CAROLINA VOTER REGISTRATION APPLICATION

Please use black or blue ink and print legibly.

07 Date Received

1	Are you a citizen of the United States of America? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No IF YOU CHECKED "NO" IN RESPONSE TO THIS QUESTION, DO NOT SUBMIT THIS FORM.	Will you be at least 18 years of age on or before election day? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Are you at least 16 years of age and understand that you must be 18 years of age on or before election day to vote? <input type="checkbox"/> Yes <input type="checkbox"/> No IF YOU CHECKED "NO" IN RESPONSE TO BOTH OF THESE QUESTIONS ABOVE, DO NOT SUBMIT THIS FORM.
---	--	---

2	Rudolph Last Name (Required)	Copland First Name (Required)
	Arnold Middle Name (Required)	<input type="checkbox"/> Jr <input type="checkbox"/> Sr <input type="checkbox"/> II <input type="checkbox"/> III <input type="checkbox"/> IV <input type="checkbox"/> V
		Date of Birth MMDDYYYY (Required)
		County of Birth
		State of Birth

3	Do you have a NC Driver's License or DMV-Issued Identification card? If yes, provide the number. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If you do not have a NC DMV-Issued license or ID card, do you have a Social Security Number? If yes, provide the last 4 digits. <input type="checkbox"/> Yes <input type="checkbox"/> No	X X X - X X -
---	--	---------------

RESIDENTIAL ADDRESS INFORMATION (STREET ADDRESS WHERE YOU LIVE) - No P.O. Boxes or Rural Routes

4	Street Address where you live (Required)	Apartment, Lot, or Unit Number
	City (Required)	State
	County	Zip Code
	Have you lived here for 30 days or more? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If "No," date moved? MMDDYYYY
		Phone (Optional)

MAILING ADDRESS

5	Mailing Address (if different from your residential address)
	City
	State
	Zip Code

MAP/DIAGRAM

If you do not have a street address, draw a map of where you reside. Please include roads and landmarks.

6	GENDER <input checked="" type="checkbox"/> Female <input type="checkbox"/> Male	RACE <input type="checkbox"/> African American/Black <input type="checkbox"/> Asian <input checked="" type="checkbox"/> White	ETHNICITY <input type="checkbox"/> American Indian/Alaska Native <input type="checkbox"/> Multiracial <input type="checkbox"/> Other	POLITICAL PARTY AFFILIATION <input checked="" type="checkbox"/> Democrat <input type="checkbox"/> Republican <input type="checkbox"/> Libertarian <input type="checkbox"/> Unaffiliated <input type="checkbox"/> Other
---	---	---	--	---

If you indicate a political party that is not currently qualified or you do not indicate a choice, you will be listed as "Unaffiliated."

PREVIOUS REGISTRATION (Name & Address used for your last voter registration - If applicable)

7	Last Name used in Previous Registration	First Name
	Previous Address	State
	Previous City	Zip Code
		Previous County

I attest, under penalty of perjury, that in addition to having read and understood the contents of this form, that:

- I am a United States citizen, as indicated above;
 - I am at least 18 years old, or will be at the time of the next general election, or I am at least 16 years old and understand that I must be at least 18 years old on election day of the general election in order to vote;
 - I shall have been a resident of North Carolina, this county, precinct, or other election district for 30 days before the election in which I intend to vote;
 - I will not vote in any other county or state after submission of this form and if I am registered elsewhere, I am canceling that registration at this time; and
 - I have not been convicted of a felony, or if I have been convicted of a felony, I have completed my sentence, including any probation or parole.
- (Citizenship and voting rights are automatically restored upon completion of the sentence. No special document is needed.)


Signature (Required)

Date

WARNING: If you sign this form and know it to be false, you can be convicted of a Class I felony.

PLEASE RETURN THE BOTTOM PORTION TO THE COUNTY BOARD OF ELECTIONS

Please confirm whether your change of address with the United States Postal Service affects your current voter registration in **BUNCOMBE COUNTY**. To ensure your continued eligibility to vote, please complete the applicable sections of this card. Your signature below is required. You must return this card within 30 days of 7/11/2013.

Voter Name COPLAND ARNOLD RUDOLPH		Voter Registration No.  000000380926-4	Move Date 4/1/2013
BOX A (USPS Address on File) 87 E EUCLID PKWY ASHEVILLE, NC 28804		BOX B (Current Voter Registration Address) 496 CLARKS CHAPEL RD WEAVERVILLE NC, 28787 AUG 06 2013	

I, **COPLAND ARNOLD RUDOLPH**, certify that (check all appropriate boxes):

My correct residential address for voting purposes is:	<input checked="" type="checkbox"/> Address in Box A	<input type="checkbox"/> Address in Box B
My correct mailing address is:	<input checked="" type="checkbox"/> Address in Box A	<input type="checkbox"/> Address in Box B

☐ My correct address is neither Box A nor Box B above. My correct address is:

☐ I have moved and no longer reside in **BUNCOMBE COUNTY**. I understand that I will be removed as a voter in this county and that I will need to register to vote in my new county or state of residence.

☐ I now reside in _____ County/State.

☐ My name has changed to: _____

If this voter is deceased, please complete the section below if you are a next of kin.

Date of Death:	County of Death:
Your Name:	Relationship:

Signature (Required)
NCO/V3 (2010)

Copland Reed

7/22/13

Date

Phone

EXHIBIT 3

**Fwd: [External] A very eligible voter**

Jennifer Baddour <jenbaddour@gmail.com>

Tue, Dec 10, 2024 at 10:34 AM

Always,
Jen

Begin forwarded message:

From: SVC_SBOE.Elections <Elections.SBOE@ncsbe.gov>
Subject: RE: [External] A very eligible voter
Date: December 9, 2024 at 8:40:10 AM EST
To: Jennifer Baddour <jenbaddour@gmail.com>

Good morning, Jennifer.

Thank you for contacting the NC State Board of Elections.

In terms of when or whether you would need to provide information, the State Board first must decide whether the protest makes legally valid arguments before the protests would move toward a hearing on the evidence as to specific voters' eligibility. If the State Board determines that this will go to a hearing, you and any other affected voters will be contacted in writing, either by the State Board or your county board of elections.

Thanks again for contacting us.

NCSBE Operation Support

From: Jennifer Baddour <jenbaddour@gmail.com>
Sent: Friday, December 6, 2024 4:44 PM
To: SVC_SBOE.Elections <Elections.SBOE@ncsbe.gov>
Subject: [External] A very eligible voter

You don't often get email from jenbaddour@gmail.com. [Learn why this is important](#)

CAUTION: External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

Dear Chair and Members of the Board of Elections:

My name is Jennifer Baddour, and I am an eligible, registered North Carolina voter and a U.S. citizen. I received notice from the North Carolina Republican Party that Judge Jefferson Griffin is protesting my vote. He appears to be alleging that my vote shouldn't count because my voter registration is "incomplete." He did not provide any guidance on how I can make sure that my ballot is not tossed out.

I was born and raised in North Carolina and have lived in the state all but 1.5 years of my 50 years of life. I registered to vote in 1992 and have regularly voted in North Carolina elections ever since, including for 15 years from my current address. When I voted in person in this year's primary and general election, I showed poll workers my NC Driver's License as my required photo ID.

As far as I know, neither Judge Griffin nor anyone else has offered individualized evidence to the NCSBE that I am not properly registered to vote in Orange County or that I've ever failed to provide information requested of me by elections officials. I followed the rules in registering to vote and in being a regular participant in NC elections for more than 3 decades. **To toss out my valid ballot based on someone else's alleged data error or omission would be unfair, undemocratic, and violate my sacred right to vote.**

I volunteered as a greeter at the polls on UNC's campus and was overwhelmed with pride and excitement to see so many first time voters exercise their right to vote. We rang a bell and cheered them on, and I told them that while they might not see actual fireworks, they will feel them in their heart when they put their vote in to be counted. To think that my vote is in question is nothing short of devastating. We can do better.

Sincerely,
Jennifer Baddour



1506 Hillsborough Street
Raleigh, NC 27605

Non-Profit
US Postage
PAID
North Carolina
Republican Party

***** NOTICE *****

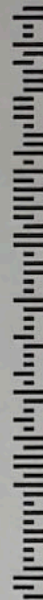
Jennifer Lynn Baddour, your vote may be affected by one or more protests filed in relation to the 2024 General Election.

Please scan this QR code to view the protest filings. Please check under the county in which you cast a ballot to see what protest may relate to you.



For more information on when your County Board of Elections will hold a hearing on this matter, please visit the State Board of Elections' website link found on the Protest Site (via the QR code).

Paid for by the North Carolina Republican Party.




58*1*16516*****5-DIGIT 27517
JENNIFER BADDOUR OR CURRENT RESIDENT

EXHIBIT 4



ATTN: ELECTIONS BOARD *IMPORTANT*

Heba Salama Photography <heba@hebasalama.com>


Thu, Dec 5, 2024 at 1:42 PM

the response I got:

----- Forwarded message -----

From: **SVC_SBOE.Elections** <Elections.SBOE@ncsbe.gov>

Date: Thu, Dec 5, 2024 at 12:34 PM

Subject: RE: [External] ATTN: ELECTIONS BOARD *IMPORTANT*

To: Heba Salama Photography <heba@hebasalama.com>

Good afternoon, Heba.

Thank you for contacting the NC State Board of Elections.

A candidate for N.C. Supreme Court, Jefferson Griffin, has challenged the election results and has alleged that some voters were not eligible to vote in the election.

If you received a notice from the North Carolina Republican Party stating, "your vote may be affected by one or more protests filed in relation to the 2024 general election," it means that Mr. Griffin has alleged that your ballot is ineligible.

The State Board and county boards of elections are considering these challenges in the coming weeks.

If you would like to get in touch with the parties to this proceeding, the email address for the candidate bringing the challenges is info@jeffersongriffin.com. The email address for the candidate opposing the challenges is team@riggsfourcourts.com.

In terms of when or whether you would need to provide information, the State Board first must decide whether the protest makes legally valid arguments before the protests would move toward a hearing on the evidence as to specific voters' eligibility. If the State Board determines that this will go to a hearing, you and any other affected voters will be contacted in writing, either by the State Board or your county board of elections.

Thanks again for contacting us.

NCSBE Operation Support



NORTH CAROLINA

STATE BOARD OF ELECTIONS

From: Heba Salama Photography <heba@hebasalama.com>
Sent: Thursday, December 5, 2024 10:52 AM
To: SVC_SBOE.Elections <Elections.SBOE@ncsbe.gov>
Subject: [External] ATTN: ELECTIONS BOARD *IMPORTANT*

You don't often get email from heba@hebasalama.com. [Learn why this is important](#)

CAUTION: External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

Dear Chair and Members of the Board of Elections:

My name is Heba Salama, and I am an eligible registered voter in North Carolina and a U.S. citizen. While I have received no notice from Judge Jefferson Griffin about his protest of his election loss, I learned from a contact at a voting rights organization that my name is on the list of Orange County voters whose ballots he is protesting because of supposedly incomplete voter registration files. This protest threatens my fundamental constitutional rights, and I ask that the Board reject it and finalize NC elections.

I was born at UNC hospital in Chapel Hill in 1978, lived in Chapel Hill my entire childhood, and first registered to vote in North Carolina when I turned 18 in 1996. I've been a regular voter in NC ever since. I have never had an address outside of the state of North Carolina. I have moved occasionally within the Triangle area, most recently from Chatham County back to Orange County 7 years ago.

My vote is lawful and must be counted. Judge Griffin has not provided any individualized evidence that I failed to provide all the information that election officials asked me to provide when I submitted my voter registration application decades ago or when I updated it over the years as I continued to be a consistent participant in NC elections.

Regardless of what is in my voter file, I have provided sufficient information to election officials to prove my identity and eligibility to vote, including when I voted early in-person in the 2024 general election at Seymour Center on Homestead Road, in Chapel Hill, and showed my NC Driver's License. I also showed my NC Driver's License when I voted in this year's primary election in March. Because of this, I have already given election officials whatever information the protest claims is missing from my voter file.

If there was some mistake made by election officials, that cannot be a reason to reject my vote. I have relied in good faith on my election officials informing me that I am properly registered to vote. My vote shouldn't be taken away because of any mistake the government made that is completely out of my control.

12/22/24, 4:07 PM

I am shocked that my name appears on any list, as I have lived in Chapel Hill or Raleigh my entire 46 years, and I am a business owner in the area for over 15 years. This protest is not about election integrity; throwing out my valid vote would harm the integrity of this election. I followed the rules, and any effort to change the rules applying to my ballot after the election is over would be undemocratic.

This feels very much like I am being profiled because of the origin and ethnicity of my name (which I have also never changed for marriage). I expect that you will take this information, from myself and others affected, and do what is right to uphold our votes.

Sincerely,
Heba Salama

--

www.hebasalama.com

Best of the Knot

Best Photographer: Chapel Hill Magazine

919-368-1506

heba@hebasalama.com

[Quoted text hidden]

EXHIBIT 5



Fwd: Protect my voting rights!

Iryna Merideth <iryna.merideth@gmail.com>



Fri, Dec 6, 2024 at 4:16 PM

----- Forwarded message -----

From: **Iryna Merideth** <iryna.merideth@gmail.com>

Date: Fri, Dec 6, 2024 at 4:14 PM

Subject: Protect my voting rights!

To: <elections.sboe@ncsbe.gov>

Dear Chair and Members of the Board of Elections:

My name is Iryna Merideth and I am an eligible registered voter in North Carolina and a U.S. citizen. I received a notice from the NC Republican Party that my ballot is being challenged by Judge Jefferson Griffin in his protest of his loss to Justice Allison Riggs, but the notice did not tell me how to protect my vote.

I registered to vote 11 years ago at my naturalization ceremony in Durham, NC. I was born and raised in Ukraine and chose to become a U.S. citizen, like my husband and child (now children), in 2013. I have lived at my current address in Orange County for 10 years and voted regularly in NC elections.

As far as I'm aware, Judge Griffin hasn't offered any individualized evidence that I failed to provide all the information that election officials asked me to provide when I submitted my voter registration application. I don't know what, if anything, is missing from my voter file, but I do know I have provided sufficient information to election officials to prove my identity and eligibility to vote. For instance, I voted in person during both the 2024 primary and the 2024 general election and showed my NC Driver's license to poll workers in both elections. If there is an error in my file, it is not of my making, and it would be wrong to take away my vote because of a mistake (if there even was one) by someone at the Board of Elections.

I am an eligible NC voter, U.S. citizen, and followed the rules for voting in this state. My ballot was rightly counted and to throw it out now would be undemocratic and violate my constitutional rights.

I am deeply concerned about and frustrated with this attempt to interfere with my ability to exercise my voting rights, as well as with the lack of transparency demonstrated in Judge Griffin's protest. The right to vote - and have every vote count - is a cornerstone of democracy. For this right to be questioned in this way threatens the integrity of the electoral process.

Sincerely,
Iryna Merideth



Fwd: Protect my voting rights!

Iryna Merideth <iryna.merideth@gmail.com>


Mon, Dec 30, 2024 at 3:01 PM

 Please find the NCSBE correspondence below.

Thanks,
- Iryna

----- Forwarded message -----

From: **SVC_SBOE.Elections** <Elections.SBOE@ncsbe.gov>

Date: Mon, Dec 9, 2024 at 8:27 AM

Subject: RE: [External] Protect my voting rights!

To: Iryna Merideth <iryna.merideth@gmail.com>

Good morning, Iryna.

Thank you for contacting the NC State Board of Elections.

The State Board of Elections is providing the following information, in response to messages received from voters asking about a mailing they received concerning an election protest.

A candidate for N.C. Supreme Court, Jefferson Griffin, has challenged the election results and has alleged that some voters were not eligible to vote in the election.

If you received a notice from the North Carolina Republican Party stating, "your vote may be affected by one or more protests filed in relation to the 2024 general election," it means that Mr. Griffin has alleged that your ballot is ineligible.

The State Board and county boards of elections are considering these challenges in the coming weeks.

If you would like to get in touch with the parties to this proceeding, the email address for the candidate bringing the challenges is info@jeffersongriffin.com. The email address for the candidate opposing the challenges is team@riggsforourcourts.com.

In terms of when or whether you would need to provide information, the State Board first must decide whether the protest makes legally valid arguments before the protests would move toward a hearing on the evidence as to specific voters' eligibility. If the State Board determines that this will go to a hearing, you and any other affected voters will be contacted in writing, either by the State Board or your county board of elections.

Thanks again for contacting us.

NCSBE Operation Support

From: Iryna Merideth <iryna.merideth@gmail.com>
Sent: Friday, December 6, 2024 4:14 PM
To: SVC_SBOE.Elections <Elections.SBOE@ncsbe.gov>
Subject: [External] Protect my voting rights!

You don't often get email from iryna.merideth@gmail.com. [Learn why this is important](#)

CAUTION: External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

[Quoted text hidden]




NORTH CAROLINA
STATE BOARD OF ELECTIONS

image001.png
31K

EXHIBIT 6



Fwd: [External] Please reject voter challenges

Rani Dasi <ranidasi@yahoo.com>


Tue, Dec 31, 2024 at 1:49 PM

What can you do to make the world better? Consider the environment. Please recycle.

Begin forwarded message:

From: "SVC_SBOE.Elections" <elections.sboe@ncsbe.gov>
Date: December 6, 2024 at 2:11:39 PM EST
To: Rani Dasi <ranidasi@yahoo.com>
Subject: RE: [External] Please reject voter challenges

Good afternoon,

Thank you for contacting the NC State Board of Elections.

A candidate for N.C. Supreme Court, Jefferson Griffin, has challenged the election results and has alleged that some voters were not eligible to vote in the election.

If you received a notice from the North Carolina Republican Party stating, "your vote may be affected by one or more protests filed in relation to the 2024 general election," it means that Mr. Griffin has alleged that your ballot is ineligible.

The State Board and county boards of elections are considering these challenges in the coming weeks.

If you would like to get in touch with the parties to this proceeding, the email address for the candidate bringing the challenges is info@jeffersongriffin.com. The email address for the candidate opposing the challenges is team@riggsforourcourts.com.

Thank you for contacting us.

Regards,

Jessica Bule

Learning and Operations Manager

www.ncsbe.gov



From: Rani Dasi <ranidasi@yahoo.com>
Sent: Friday, December 6, 2024 1:18 PM
To: SVC_SBOE.Elections <Elections.SBOE@ncsbe.gov>
Subject: [External] Please reject voter challenges

You don't often get email from ranidasi@yahoo.com. [Learn why this is important](#)

CAUTION: External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

Dear members of the North Carolina Board of Elections,

I clearly remember excitedly looking forward to turning 18 so that I could vote. When my 18th birthday came, I immediately registered to vote and have consistently voted in nearly every election over the next 40+ years! I am also a three-time elected official which means my registration status has been repeatedly verified by the Board of Elections and when I voted most recently in the November 2024 general election, I showed my driver's license as required **AND** confirmed that there is no missing information in my voter registration file.

So you might imagine my surprise at seeing my name and the names of others who have consistently been confirmed as registered voters included on the list of protested voters. It seems clear that this "protest" includes a random list of names in a poorly disguised effort to suppress votes.

I ask the board not to throw out my vote and the votes of the many North Carolinians who participated in our democratic process.

Thank you for your service and please feel free to contact me if you have any questions or I can provide any other information.

Thank you

Rani Dasi